

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF WARREN POLICE AND FIRE
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

WORLD WRESTLING ENTERTAINMENT,
INC., VINCENT K. McMAHON, GEORGE
A. BARRIOS, and MICHELLE D. WILSON,

Defendants.

Civil Action No. 1:20-cv-02031-JSR

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff, Firefighters' Pension System of the City of Kansas City, Missouri Trust, on behalf of itself and all other members of the proposed Settlement Class, through court-approved Lead Counsel Labaton Sucharow LLP, will move this Court on June 15, 2021 at 4:00 p.m., either remotely or in person at the court's discretion, before the Honorable Jed S. Rakoff, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Order and Judgment approving the proposed Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation for the proceeds of the Settlement as fair, reasonable, and adequate.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff submits and is filing herewith: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation, dated May 11, 2021; and (ii) the Declaration of Carol C. Villegas in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, dated May 11, 2021, with annexed exhibits.

Proposed Orders will be submitted with Lead Plaintiff's reply submission on or before June 8, 2021, after the deadlines for objecting and seeking exclusion have passed.

DATED: May 11, 2021

LABATON SUCHAROW LLP

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*Counsel for Lead Plaintiff Firefighters'
Pension System of the City of Kansas City,
Missouri Trust and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2021, I caused the foregoing Notice of Lead Plaintiff's Motion for Final Approval of Proposed Class Action Settlement to be served electronically through the Court's ECF system upon all ECF participants.

/s/ Carol C. Villegas
CAROL C. VILLEGRAS